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19 **UNITED STATES DISTRICT COURT**
20 **NORTHERN DISTRICT OF CALIFORNIA**
21 **SAN FRANCISCO DIVISION**

22 AMERICAN FEDERATION OF
23 GOVERNMENT EMPLOYEES, AFL-CIO, *et al.*,

24 Plaintiffs,

25 v.

26 DONALD J. TRUMP, in his official capacity as
27 President of the United States, *et al.*,

28 Defendants.

Case No. 3:25-cv-03070-JD

**DECLARATION OF CHRISTINA
COMEAU**

Declaration of Christina Comeau
Case No. 3:25-cv-03070-JD

DECLARATION OF CHRISTINA COMEAU

I, Christina Comeau, declare as follows:

1. I am over 18 years of age and competent to give this declaration. This declaration is based on my personal knowledge, information, and belief.

2. I am the President of Local 1164 of the National Federation of Federal Employees (“NFFE”). NFFE is a national labor organization and unincorporated membership organization headquartered in Washington, D.C.

3. Nationwide, NFFE represents approximately 110,000 federal workers, approximately 10,000 of whom are dues-paying members, from agencies across the federal government.

4. NFFE Local 1164 represents approximately 480 employees working at the US Army Corps of Engineers (USACE) - New England District and the US Coast Guard (USCG) Civil Engineering Unit - Providence. NFFE members include professional and non-professional staff in many locations throughout the nation. These employees consist of Civil Engineers (including Geotechnical, Hydraulics, Structural, and Interdisciplinary specialties); Mechanical Engineers; Electrical Engineers; Environmental Engineers and Scientists; General Engineers; Engineering Technicians (including Civil and Project Engineers); Construction Control Representatives; Architects; Survey Technicians (including Geospatial and Hydrographic Leads); and Hydraulic Engineers. Also represented are Biologists (including General, Environmental, and Biological Science Specialists); Ecologists; Chemists; Geologists; Physical Scientists (including Hydrogeologists and Land Surveyors); Natural Resource and Environmental Resource Specialists (including Rangers); and Data Scientists. The bargaining unit also includes Program and Management Analysts (including Project Schedulers); Financial Management and Budget Analysts; Contract and Procurement Specialists; Public Affairs Specialists (including Digital Communications); Regulatory and Realty Specialists; Safety & Occupational Health Specialists; Legal Assistants and Legal Instruments Examiners; Emergency Management Specialists; Auditors; Economists (including Regional); Review Appraisers; Office

1 and Administrative Support Staff (including Office Assistants, Automation Assistants, and
2 Support Assistants); Maintenance Workers; Basin Assistants; Park Rangers; Project Managers.

3 5. NFFE's Local 1164 has demanded to bargain over Trump administration policies
4 including the return to in-office work and telework. NFFE has also placed requests for
5 information on these subjects.

6 6. NFFE's Officers and stewards represent employees primarily on official time
7 which the Executive Order abolishes. Our members perform much of their representation using
8 agency equipment such as computers, computer systems and phones, also abolished by the
9 Executive Order. The loss of official time and use of agency equipment will significantly impact
10 our ability to represent our members.

11 7. NFFE represents our federal sector members through negotiating collective
12 bargaining agreements and assisting employees with enforcing them. We assert contractual and
13 statutory rights on behalf of our federal sector members by filing grievances, unfair labor
14 practice charges, or other complaints through our negotiated grievance procedure or with various
15 federal agencies, including the Federal Labor Relations Authority, the Merit Systems Protection
16 Board, the Office of Special Counsel, and the Federal Labor Relations Authority. NFFE files
17 litigation on employees' behalf in the courts. We also advocate Capitol Hill and in the media on
18 issues of importance to federal workers.

19 8. NFFE's operations are funded solely by members who pay dues to be members of
20 the union, almost exclusively through Agency dues withholding. NFFE will be financially
21 harmed if the Executive Order is implemented because it will immediately lose dues revenue
22 from members who are covered by the Executive Order. In that event, NFFE would immediately
23 lose hundreds of thousands of dollars of revenue. NFFE currently does not have a mechanism to
24 maintain membership of union members replacing Agency dues withholding.

25 9. NFFE's ability to conduct its mission will be severely curtailed if union members
26 in the USACE and USCG no longer have collective bargaining rights and cannot pay dues to
27 NFFE through Agency dues withholding. For example, NFFE would not have the ability to

1 maintain current staff levels, help with training union leaders, assist with grievances, negotiating
2 collective bargaining agreements, ensuring workplace safety, advocating for employees on
3 Capitol hill, and filing litigation on behalf of the employees we represent.

4 10. NFFE members pay dues voluntarily as federal employees.

5 11. We have heard from members who are concerned about NFFE losing strength and
6 bargaining power because of the threat of diminished membership and smaller bargaining units.
7 NFFE leverages its size and the fact we represent approximately 110,000 federal employees when
8 advocating in the media or to Congress and when bargaining with agencies. The Executive Order
9 stands to reduce NFFE's size and capacity, thereby curbing our abilities to advocate for positive
10 change for federal workers.

11 12. Since the signing of President Trump's E.O. 14207 on March 27th, 2025, the
12 DOD, and as a subordinate USCOE, has unilaterally and unlawfully revoked recognition of the
13 National Federation of Federal Employees (NFFE) as the exclusive representative of its
14 bargaining units, in direct violation of established labor law and collective bargaining rights.
15 This has effectively dismantled the union's ability to represent its members. Furthermore, the
16 suspension of all pending grievances, arbitrations, and bargaining activities previously protected
17 under the collective bargaining agreement constitutes a clear breach of labor protections. The
18 agency's refusal to communicate with the union is an additional obstruction to lawful union
19 representation. These actions reflect a deliberate and retaliatory effort to suppress federal
20 employees' right to collective representation.

21
22 I declare under penalty of perjury under the laws of the United States that the foregoing is true
23 and correct. Executed April 1st, 2025, in Massachusetts.

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25 

26
27
28 Christina Comeau